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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of Implementation of Section 309(j) of the Communications Act Competitive Bidding	))))))	PP Docket No. 93-253

COMMENTS OF
GVNW INC./ MANAGEMENT

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GVNW Inc./Management (GVNW) submits these comments in response to the Notice of Proposed Rulemaking (NPRM) released October 12, 1993, in PP Docket 93-253 concerning Implementation of Section 309(j) of the Communications Act Competitive Bidding.

GVNW is a consulting firm providing financial and consulting services to independent telephone companies. The majority of GVNW's 200 client companies serve rural areas and have made significant investments to provide quality service to their subscribers. Many of these companies' service areas are not being provided cellular service and we are concerned that their customers not be effectively denied PCS.

There is little incentive for large scale licensees to serve the rural areas. The large size of the BTAs and MTAs and the must build provision will attract large scale providers capable of serving a large portion of the BTA or MTA population base. These licensees will in all likelihood serve only the higher value metropolitan subscribers. The cost to serve the potential subscribers ("pops") is higher in rural areas than in metropolitan areas, making metro pops more valuable. Assuming equal penetration of the market in all portions of the service area, economics dictate that the areas with the lowest cost per subscriber be built first to maximize revenue and minimize cost (usually geographically based). More costly areas are built later, if at all. At some point, it becomes uneconomical to serve areas with very low population density (e.g., rural areas). These areas will not receive service if profit is the driving factor. This is the reason that, while CATV passes over 90% of homes, much less than 90% of the geographic area of the U.S. is served by CATV. This is analogous to the deployment of Equal Access. There was little financial incentive for large scale providers to provide Equal Access to the rural areas. For this reason, Equal Access was not brought to the rural subscribers of

Independent telephone companies by the efforts of the large scale providers, but by the rural Independents. A recent example of this same pattern is the current trend of many large scale providers in selling off their rural exchanges to avoid the cost of modernization, and to concentrate on the more lucrative metropolitan areas. In the meantime, the rural telcos have been modernizing their exchanges in an effort to bring the benefits of high quality state of the art service to their subscribers. The rural telco is uniquely positioned to address these cost/benefit challenges and to provide modern telecommunications services, including PCS to its customers. The Chief Counsel of advocacy of the U.S. Small Business Administration (SBA) pointed out that

> "LECs may be the only party interested in providing the infrastructure needed for PCS in rural areas, and therefore prohibiting LECs from providing PCS may reduce rural areas to second-class status in wireless communications."[1].

Cellular service is a good example of what could happen if provisions are not included to facilitate rural telco PCS service. The small companies were often precluded from providing cellular to their own service areas because entire MSAs and RSAs were too large for an Independent to provide service to, requiring more capital than an ITC could reasonably be expected to raise. In order to avoid being shut out from the process entirely, many small companies acquired a minority partnership position behind an RBOC, GTE, or a managing partner corporation. For the most part, these partnerships asked for several cash calls after the initial investment, and showed little, if any, profit. When the managing partners offered to buy out the minority partners, the small telcos were faced with a decision of either accepting a return on their investment, or continuing to pay into what, for them, was an unprofitable partnership arrangement. This situation influenced many to sell their interests. Many small telcos never realized the opportunity of serving their area with cellular and their subscribers are without that service today.

The proposed rules should provide rural telcos the opportunity for providing PCS service in their serving areas. The rules should avoid a situation where the rural telco must buy a license for an entire BTA or MTA even though it may be primarily interested in, and most capable of, serving only its own serving area. This is a severe, anti-competitive entry barrier reminiscent of some instances in the cellular industry. Secondly, the "must build" provision does not guarantee that rural areas will ever have PCS. In fact, it hampers the efforts of rural telcos interested in serving their areas. The "must-build" provision requires that the licensee serve increasing percentages (33%, 66%, 90%) of the total population in its license area (BTA or MTA) over time, up to 90% at 10 years. Since the rural telephone company serving area generally contains a very small percentage of the total population of the a BTA or MTA, the rural subscribers have no assurance of service availability. The proposed rules provide difficult barriers for rural telcos in the short term due to the large initial investment for the license. Even if a license is secured

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[1]From FCC 93-451 Docket No. 90-314 page 50, para 120:

the cost of building a network to provide service for 90% of that BTA/MTA may require an enormous expansion of the capabilities of a small business.

Analysis of the "must build" requirements

Even with the "must build" requirements proposed in the NPRM, (the successful Bidder must be able to offer service to 33% of the population in a service area, i.e. BTA or MTA, in 5 years, 66% in 7 years, and 90% in 10 years.) there are substantial rural areas that will either not be built soon or will never be built unless the FCC either provides an economic incentive to serve these areas, or allows companies with a vested interest in these areas to serve them.

In many cases, it is possible to meet the mandated must build requirements by building only the urbanized metropolitan areas in a BTA or MTA. To show this, GVNW has analyzed MTAs and BTAs in the western United States. In order to approximate metropolitan and rural areas, GVNW has used counties. See Schedule 1. All data was based on the 1993 Rand McNally Commercial Atlas and Marketing Guide.

From the analysis, it can be seen that, in almost all the BTAs and MTAs examined, the largest portion of the population resides in a small portion of the geographic area. Large rural geographic areas will not need to be built to meet the proposed must build requirements. For example, in BTA 8, centered around the Albuquerque, NM metropolitan area, a provider could offer service to 85.553% of the population of this entire BTA by serving only the three metropolitan counties near Albuquerque out of the 12 counties in the BTA. The metropolitan counties comprise only 13.834% of the land area of the BTA. Thus, based on economic considerations alone, 9 counties would probably not be served until year 10. Even after year 10, large portions of the BTA would never be served based on the proposed must build requirements. Similar population distribution and hence, service area coverage, exist in most western BTAs and MTAs. In some very significant MTAs, such as Los Angeles, a huge portion (98.726%) of the population can be covered by serving the metropolitan areas only. Half the land area remains unserved, including the rural inhabitants of these areas. In the case of this particular MTA, the rural population that will not be served is over 240,000 people.

Counties can provide an approximate guide to distinguish between metropolitan and rural areas. In many cases, however, not all of a county that has been designated urban will be served by a PCS provider based purely on economic considerations. An example of this is San Bernardino County, CA. This county stretches from the eastern edge of the Los Angeles Metropolitan area to the Arizona/Nevada border. The western portion of the county is highly urbanized, however, the eastern portion is very sparsely inhabited. The western portion of San Bernardino County will be built along with the rest of the Los Angeles metropolitan area. The eastern area will probably not be built at all, since there is no economic reason for a provider based in Los Angeles to serve the area, and the must build rules for the BTA and MTA will be met when the metropolitan Los Angeles area is served. The areas not served may in fact be greater than indicated in GVNW's comments.

From this analysis, it is apparent that the proposed must build rules will not guarantee deployment of PCS in the rural areas. Under the proposed must build rules, many rural areas will remain "have nots" for portable communications.

One way to assure that rural areas are served is to allow those companies with a vested interest in the rural areas to serve those areas only. This could be accomplished by partitioning BTAs to allow a provider to serve only those areas in which it has a business interest. Since rural providers are typically small companies, the rural provider would have the resources and business focus to serve its smaller service area well. By not having to serve the entire BTA, the rural provider would not have to become overextended by serving a metropolitan area where it has neither the resources, the expertise, nor the desire to serve. Barring this arrangement, a large provider with large area focus will serve rural areas only when its business interests dictate, certainly late in the deployment schedule, and, perhaps, never.

This has been proved true by the history of cellular and equal access, and all new telecommunications service improvements.

GVNW's position:

1. The attached Schedule I reflects a population and land area analysis for seven western Major Trading Areas and ten Basic Trading Areas contained therein. The intent is to illustrate that the population base is highly concentrated and that the must-build rules will tend to only be effective for the metropolitan subscriber. The must build rules will not guarantee deployment of PCS in the rural areas.

2. Rural telephone companies have a proven dedication to rural areas and rural subscribers they serve. The FCC states that

   > "For example, some potential PCS licensees may be interested in serving only their local areas, including smaller communities that are less economic to serve. By permitting broader participation, smaller service areas may produce a greater degree of technical and service innovation than would be expected from a few large firms. Such diversity may be an important benefit during the initial period of PCS implementation when the market and services are still being defined."[2]

3. The rural telco has a different business focus from the large provider. The rural telephone companies have the greatest incentive and a proven history of providing telephone service to rural areas of America. The rural telco's mission includes providing PCS to its rural subscribers if it is not effectively barred from doing so, economically or by regulations. In their service areas and communities of interest, ITCs are more interested in providing and more likely to provide modern services than large companies. ITCs would therefore be desirable PSC license owners for these smaller areas.

4. Independents should qualify for a preference because of two factors: they are small businesses and they are rural carriers. Accordingly, the Commission should adopt proposals that ensure the public interest defined by Congress is carried out. An appropriate definition of eligibility for the preference can be found in the definition of "Tier 3", which defines a small telephone company as one serving fewer than 50,000 access lines. These companies should be eligible for the designated entity preferences for licenses in all areas, both inside and outside of their telephone serving areas.

5. With respect to PCS, small telcos should be eligible to participate in the bidding for the channel blocks set aside for the designated entity groups (Channel Blocks C and D, see par 121.) Consistent with paragraph 75, Channel Block C should be set aside only for small telcos to promote their participation in the provision of PCS.

6. In addition, and separate from the adoption of above set aside, small telcos that lose in the bidding process for the set aside blocks should be permitted to apply to the FCC to

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[2]From FCC 93-451 Docket No. 90-314, pg. 34 para 75

partition the licenses area prior to construction by the successful bidder. Under this proposal, the Independent would be licensed to serve in a partitioned area consisting of its service area. The independent would be required to pay a discounted pro rata portion of the successful bid on the basis of 70% the auction cost per pop. The rational for the discount is that, as mentioned earlier, the cost of providing service to rural subscribers is above the average cost per subscriber, therefore the value of the rural franchise per pop is lower. This may not be the correct discount, but some discount is warranted. This can be seen in the cellular industry where low population density rural area licenses routinely sold for less than the national average.

7. Outside of their service areas, small telcos should be entitled to participate in the bidding process as a designated entity in order to promote the Congressional objective of promoting the participation of rural telcos and small businesses. In addition to eligibility to participate in the bidding for PCS channel blocks C and D, the designated groups should be entitled to certain preferences in bidding for any channel block. these preferences include deferred payment of the bid price with interest rates that do not exceed a defined national prime rate; a 10% bid credit for successful bids for channel blocks not specifically designated for the preference group (this will assist in promoting the participation of the preference groups in bidding for the larger A and B blocks which are designated to be licensed to the larger MTAs. In addition, tax credits should be used to promote the sale of spectrum to the preference groups subsequent to the auction - a tax credit would give a tax benefit to the entity that sells spectrum to a designated entity.

8. Our primary point is that rural Independent telephone subscribers must necessarily depend on the rural telephone companies to bring quality communications service to them. In the case of the rural cooperatives their very existence is due to the lack of incentives for anyone else to serve their customers. If any new communications technology is to be effectively provided to these service areas the rural telephone companies must not be effectively prohibited from participation. Adoption of this proposal will promote the public interest by ensuring the provision of PCS services to rural constituents through the participation of rural LECs within their respective service areas.

Respectfully submitted,

GVNW Inc./Management

Date: 11/10/93 By: [signature]

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

MTA	BTA	STATE	MAJOR METRO AREA	PERCENT OF TOTAL MTA/BTA THAT IS IN METRO AREA	
				POPULATION	LAND AREA
27					
	8	NM	ALBUQUERQUE, NM	85.553%	13.894%
	TOTAL MTA	TX, NM, CO, AZ, UT	EL PASO, TX	80.714%	25.591%
43					
	245	NV, AZ	LAS VEGAS, NV	86.432%	14.761%
	TOTAL MTA	CA, NV, AZ	LOS ANGELES, CA	98.726%	50.090%
71					
	358	OR, WA	PORTLAND, OR	67.401%	13.845%
	TOTAL MTA	OR, WA, CA	PORTLAND, OR	84.352%	32.140%
77					
	50	ID, OR	BOISE, ID	71.032%	4.737%
	TOTAL MTA	UT, ID, WY, OR, NV	SALT LAKE CITY, UT	75.474%	8.619%
81					
	157	CA	FRESNO, CA	88.341%	73.698%
	371	CA	REDDING, CA	77.669%	41.579%
	372	NV, CA	RENO, NV	73.472%	11.167%
	TOTAL MTA	CA, NV	SAN FRANCISCO/ SACRAMENTO, CA	91.630%	34.627%
83					
	331	WA	OLYMPIA, WA	85.193%	76.598%
	TOTAL MTA	WA	SEATTLE, WA	89.618%	48.306%
85					
	41	MT, WY	BILLINGS, MT	47.196%	6.881%
	480	OR, WA	PENDLETON, OR	71.052%	32.599%
	TOTAL MTA	OR, WA, ID, MT, WY	SPOKANE, WA	66.425%	16.363%

SOURCE: RAND MCNALLY COMMERCIAL ATLAS AND MARKETING GUIDE - 1993

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/80 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 27								
BTA 8								
1	Bernalillo	NM	480,577	1,166	8	27	480,577	1,166
	Catron	NM	2,563	6,928	8	27		
	Cibola	NM	23,794	4,540	8	27		
	Colfax	NM	12,925	3,757	8	27		
	Guadalupe	NM	4,156	3,031	8	27		
	Harding	NM	967	2,126	8	27		
	Mora	NM	4,264	1,931	8	27		
	San Miguel	NM	25,743	4,718	8	27		
1	Sandoval	NM	63,319	3,710	8	27	63,319	3,710
	Socorro	NM	14,764	6,647	8	27		
	Torrance	NM	10,285	3,345	8	27		
1	Valencia	NM	45,235	1,066	8	27	45,235	1,066
	TOTAL BTA 8		686,612	42,967			589,131	5,944
	METROPOLITAN PERCENT OF BTA 8						85.553%	13.834%
1	Eddy	NM	48,605	4,182	66	27	48,605	4,182
	Otero	NM	51,928	6,627	126	27		
	Culberson	TX	3,407	3,813	126	27		
1	El Paso	TX	591,610	1,013	126	27	591,610	1,013
	Hudspeth	TX	2,915	4,571	126	27		
	Archuleta	CO	5,345	1,349	139	27		
	Dolores	CO	1,504	1,067	139	27		
1	La Plata	CO	32,284	1,692	139	27	32,284	1,692
	Montezuma	CO	18,672	2,037	139	27		
	San Juan	CO	745	387	139	27		
1	San Juan	NM	91,605	5,514	139	27	91,605	5,514
	San Juan	UT	12,621	7,821	139	27		
	Apache	AZ	61,591	11,206	162	27		
1	McKinley	NM	60,686	5,449	162	27	60,686	5,449
1	Dona Ana	NM	135,510	3,808	244	27	135,510	3,808
	Grant	NM	27,676	3,966	244	27		
	Hidalgo	NM	5,958	3,446	244	27		
	Luna	NM	18,110	2,965	244	27		
	Sierra	NM	9,912	4,181	244	27		
1	Chaves	NM	57,849	6,071	366	27	57,849	6,071
	Lincoln	NM	12,219	4,832	366	27		
	Los Alamos	NM	18,115	109	407	27		
	Rio Arriba	NM	34,365	5,858	407	27		
1	Santa Fe	NM	98,928	1,909	407	27	98,928	1,909
	Taos	NM	23,116	2,203	407	27		
	TOTAL MTA 27		2,113,890	139,043			1,706,209	35,592
	METROPOLITAN PERCENT OF MTA 27						80.714%	25.591%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/90 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 43								
BTA 245								
1	Mohave	AZ	93,497	13,312	245	43		
1	Clark	NV	741,459	7,911	245	43	741,459	7,911
	Esmeralda	NV	1,344	3,589	245	43		
	Lincoln	NV	3,775	10,635	245	43		
	Nye	NV	17,781	18,147	245	43		
	TOTAL BTA 245		857,856	53,594			741,459	7,911
	METROPOLITAN PERCENT OF TOTAL BTA 245						86.432%	14.761%
BTA 282								
	Inyo	CA	18,281	10,192	282	43		
1	Los Angeles	CA	8,863,164	4,060	282	43	8,863,164	4,060
1	Orange	CA	2,410,556	790	282	43	2,410,556	790
1	Riverside	CA	1,170,413	7,208	282	43	1,170,413	7,208
1	San Bernardino	CA	1,418,380	20,062	282	43	1,418,380	20,062
1	Ventura	CA	669,016	1,846	282	43	669,016	1,846
	TOTAL BTA 282		14,549,810	44,158			14,531,529	33,966
	METROPOLITAN PERCENT OF TOTAL BTA 282						99.874%	76.919%
1	Kern	CA	543,477	8,142	28	43	543,477	8,142
	Imperial	CA	109,303	4,175	124	43		
1	San Diego	CA	2,498,016	4,204	402	43	2,498,016	4,204
1	San Luis Obispo	CA	217,162	3,305	405	43	217,162	3,305
1	Santa Barbara	CA	369,608	2,738	406	43	369,608	2,738
	TOTAL MTA 43		19,145,232	120,316			18,901,252	60,267
	METROPOLITAN PERCENT OF TOTAL MTA 43						98.728%	50.090%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/90 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 43								
BTA 245								
1	Mohave	AZ	93,497	13,312	245	43		
1	Clark	NV	741,459	7,911	245	43	741,459	7,911
	Esmeralda	NV	1,344	3,589	245	43		
	Lincoln	NV	3,775	10,635	245	43		
	Nye	NV	17,781	18,147	245	43		
	TOTAL BTA 245		857,856	53,594			741,459	7,911
	METROPOLITAN PERCENT OF TOTAL BTA 245						**86.492%**	**14.761%**

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/90 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 71								
BTA 358								
1	Clackamas	OR	278,850	1,868	358	71	278,850	1,868
	Clatsop	OR	33,301	827	358	71		
	Columbia	OR	37,557	657	358	71		
	Grant	OR	7,853	4,529	358	71		
	Harney	OR	7,060	10,135	358	71		
	Hood River	OR	16,903	522	358	71		
	Lincoln	OR	38,889	980	358	71		
1	Multnomah	OR	583,887	435	358	71	583,887	435
	Sherman	OR	1,918	823	358	71		
	Tillamook	OR	21,570	1,102	358	71		
	Wasco	OR	21,683	2,381	358	71		
1	Washington	OR	311,554	724	358	71	311,554	724
	Wheeler	OR	1,396	1,715	358	71		
1	Yamhill	OR	65,551	716	358	71	65,551	716
1	Clark	WA	238,053	628	358	71	238,053	628
	Klickitat	WA	16,616	1,872	358	71		
	Skamania	WA	8,289	1,867	358	71		
	TOTAL BTA 358		1,690,930	31,571			1,477,895	4,371
	METROPOLITAN PERCENT OF TOTAL BTA 358						87.401%	13.846%
BTA 395								
1	Benton	OR	70,811	677	395	71	70,811	677
	Linn	OR	91,227	2,291	395	71		
1	Marion	OR	228,483	1,185	395	71	228,483	1,185
	Polk	OR	49,541	741	395	71		
	TOTAL BTA 395		440,062	4,894			299,294	1,862
	METROPOLITAN PERCENT OF TOTAL BTA 395						68.012%	38.047%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/90 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 71 (CONT)								
	Crook	OR	14,111	2,980	38	71		
1	Deschutes	OR	74,958	3,018	38	71	74,958	3,018
	Jefferson	OR	13,676	1,781	38	71		
1	Coos	OR	60,273	1,601	97	71	60,273	1,601
	Curry	OR	19,327	1,628	97	71		
1	Lane	OR	282,912	4,554	133	71	282,912	4,554
	Modoc	CA	9,678	3,944	231	71		
	Klamath	OR	57,702	5,945	231	71		
	Lake	OR	7,186	8,136	231	71		
1	Cowlitz	WA	82,119	1,139	261	71	82,119	1,139
	Wahkiakum	WA	3,327	264	261	71		
1	Jackson	OR	146,389	2,785	288	71	146,389	2,785
1	Josephine	OR	62,649	1,640	288	71	62,649	1,640
1	Douglas	OR	94,649	5,037	385	71	94,649	5,037
	TOTAL MTA 71		3,069,948	80,917			2,591,138	26,007
	METROPOLITAN PERCENT OF TOTAL MTA 71						84.352%	32.140%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/90 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 77								
BTA 50								
1	Ada	ID	205,775	1,055	50	77	205,775	1,055
	Adams	ID	3,254	1,365	50	77		
	Boise	ID	3,509	1,902	50	77		
1	Canyon	ID	90,076	590	50	77	90,076	590
	Elmore	ID	21,205	3,078	50	77		
	Gem	ID	11,844	563	50	77		
	Owyhee	ID	8,392	7,678	50	77		
	Payette	ID	16,434	407	50	77		
	Valley	ID	6,109	3,678	50	77		
	Washington	ID	8,550	1,456	50	77		
	Baker	OR	15,317	3,088	50	77		
	Malheur	OR	26,098	9,886	50	77		
	TOTAL BTA 50		416,503	34,726			295,851	1,645
	METROPOLITAN PERCENT OF TOTAL BTA 50						71.062%	4.737%
	Bingham	ID	37,583	2,095	202	77		
1	Bonneville	ID	72,207	1,899	202	77	72,207	1,899
	Butte	ID	2,918	2,233	202	77		
	Clark	ID	762	1,765	202	77		
	Custer	ID	4,133	4,926	202	77		
	Fremont	ID	10,937	1,887	202	77		
	Jefferson	ID	16,543	1,095	202	77		
	Lemhi	ID	6,899	4,564	202	77		
	Madison	ID	23,674	471	202	77		
	Teton	ID	3,439	450	202	77		
	Teton	WY	11,172	4,008	202	77		
	Franklin	ID	9,232	665	258	77		
1	Cache	UT	70,183	1,165	258	77	70,183	1,165
1	Bannock	ID	66,026	1,113	353	77	66,026	1,113
	Bear Lake	ID	6,084	971	353	77		
	Caribou	ID	6,963	1,786	353	77		
	Oneida	ID	3,492	1,200	353	77		
	Power	ID	7,086	1,406	353	77		
	Juab	UT	5,817	3,392	366	77		
1	Utah	UT	263,590	1,998	366	77	263,590	1,998

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/80 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 77 (CONT)								
	Beaver	UT	4,765	2,590	392	77		
	Garfield	UT	3,980	5,175	392	77		
	Iron	UT	20,789	3,299	392	77		
	Kane	UT	5,169	3,992	392	77		
1	Washington	UT	48,560	2,427	392	77	48,560	2,427
	White Pine	NV	9,264	8,877	399	77		
	Box Elder	UT	36,485	5,724	399	77		
	Carbon	UT	20,228	1,479	399	77		
1	Davis	UT	187,941	304	399	77	187,941	304
	Duchesne	UT	12,645	3,268	399	77		
	Emery	UT	10,332	4,452	399	77		
	Millard	UT	11,333	6,590	399	77		
	Morgan	UT	5,528	609	399	77		
	Piute	UT	1,277	758	399	77		
	Rich	UT	1,725	1,089	399	77		
1	Salt Lake	UT	725,956	737	399	77	725,956	737
	Sanpete	UT	16,259	1,588	399	77		
	Sevier	UT	15,431	1,910	399	77		
	Summit	UT	15,518	1,871	399	77		
	Tooele	UT	26,601	6,946	399	77		
	Uintah	UT	22,211	4,477	399	77		
	Wasatch	UT	10,089	1,181	399	77		
	Wayne	UT	2,177	2,460	399	77		
1	Weber	UT	158,330	576	399	77	158,330	576
	Uinta	WY	18,705	2,082	399	77		
	Blaine	ID	13,552	2,645	451	77		
	Camas	ID	727	1,075	451	77		
	Cassia	ID	19,532	2,567	451	77		
	Gooding	ID	11,633	731	451	77		
	Jerome	ID	15,138	600	451	77		
	Lincoln	ID	3,308	1,206	451	77		
	Minidoka	ID	19,361	780	451	77		
1	Twin Falls	ID	53,580	1,925	451	77	53,580	1,925
	TOTAL MTA		2,573,372	159,627			1,942,224	13,759
	METROPOLITAN PERCENT OF TOTAL MTA 77						75.474%	8.619%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/80 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 81								
BTA 157								
1	Fresno	CA	667,490	5,963	157	81	667,490	5,963
	Madera	CA	88,090	2,138	157	81		
	TOTAL BTA 157		755,580	8,101			667,490	5,963
	METROPOLITAN PERCENT OF TOTAL BTA 157						88.341%	73.609%
BTA 371								
1	Shasta	CA	147,036	3,786	371	81	147,036	3,786
	Siskiyou	CA	43,531	6,287	371	81		
1	Tehama	CA	49,625	2,951	371	81	49,625	2,951
	Trinity	CA	13,063	3,179	371	81		
	TOTAL BTA 371		259,255	16,203			196,661	6,737
	METROPOLITAN PERCENT OF TOTAL BTA 371						77.663%	41.579%
BTA 372								
	Alpine	CA	1,113	739	372	81		
	Mono	CA	9,956	3,045	372	81		
1	Carson City	NV	40,443	143	372	81	40,443	143
	Churchill	NV	17,938	4,929	372	81		
1	Douglas	NV	27,637	710	372	81	27,637	710
	Elko	NV	33,530	17,182	372	81		
	Eureka	NV	1,547	4,176	372	81		
	Humboldt	NV	12,844	9,646	372	81		
	Lander	NV	6,266	5,494	372	81		
	Lyon	NV	20,001	1,994	372	81		
	Mineral	NV	6,475	3,757	372	81		
	Pershing	NV	4,336	6,069	372	81		
	Storey	NV	2,526	263	372	81		
1	Washoe	NV	254,667	6,342	372	81	254,667	6,342
	TOTAL BTA 372		439,279	64,491			322,747	7,195
	METROPOLITAN PERCENT OF TOTAL BTA 372						73.472%	11.157%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/90 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 81 (CONT)								
1	Butte	CA	182,120	1,640	79	81	182,120	1,640
	Glenn	CA	24,798	1,315	79	81		
	Del Norte	CA	23,460	1,008	134	81		
1	Humboldt	CA	119,118	3,573	134	81	119,118	3,573
	Mariposa	CA	14,302	1,451	291	81		
1	Merced	CA	178,403	1,929	291	81	178,403	1,929
1	Stanislaus	CA	370,522	1,495	303	81	370,522	1,495
	Tuolumne	CA	48,456	2,236	303	81		
	Amador	CA	30,039	599	369	81		
	Colusa	CA	16,275	1,151	369	81		
1	El Dorado	CA	125,995	1,711	369	81	125,995	1,711
	Lassen	CA	27,598	4,558	369	81		
	Nevada	CA	78,510	958	369	81		
1	Placer	CA	172,796	1,404	369	81	172,796	1,404
	Plumas	CA	19,739	2,554	369	81		
1	Sacramento	CA	1,041,219	966	369	81	1,041,219	966
	Sierra	CA	3,318	953	369	81		
1	Yolo	CA	141,092	1,012	369	81	141,092	1,012
1	Monterey	CA	355,660	3,322	397	81	355,660	3,322
1	Alameda	CA	1,279,182	736	404	81	1,279,182	736
1	Contra Costa	CA	803,732	720	404	81	803,732	720
	Lake	CA	50,631	1,258	404	81		
1	Marin	CA	230,096	520	404	81	230,096	520
	Mendocino	CA	80,345	3,508	404	81		
1	Napa	CA	110,765	754	404	81	110,765	754
	San Benito	CA	36,697	1,389	404	81		
1	San Francisco	CA	723,959	47	404	81	723,959	47
1	San Mateo	CA	649,623	449	404	81	649,623	449
1	Santa Clara	CA	1,497,577	1,291	404	81	1,497,577	1,291
1	Santa Cruz	CA	229,734	446	404	81	229,734	446
1	Solano	CA	340,421	828	404	81	340,421	828
1	Sonoma	CA	388,222	1,576	404	81	388,222	1,576
	Calaveras	CA	31,998	1,020	434	81		
1	San Joaquin	CA	480,628	1,399	434	81	480,628	1,399
	Kings	CA	101,469	1,389	458	81		
1	Tulare	CA	311,921	4,824	458	81	311,921	4,824
	Sutter	CA	64,415	603	485	81		
	Yuba	CA	58,228	630	485	81		
TOTAL MTA 81			11,891,177	145,954			10,919,683	50,539
METROPOLITAN PERCENT OF TOTAL MTA 81							91.830%	34.627%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/90 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 83								
BTA 331								
1	Lewis	WA	59,358	2,406	331	83	59,358	2,406
	Mason	WA	38,341	961	331	83		
1	Thurston	WA	161,236	727	331	83	161,236	727
	TOTAL BTA 331		258,937	4,096			220,596	3,135
	METROPOLITAN PERCENT OF TOTAL BTA 331						85.193%	76.538%
1	Grays Harbor	WA	64,175	1,917	2	83	64,175	1,917
	Pacific	WA	18,882	975	2	83		
1	Whatcom	WA	127,780	2,120	36	83	127,780	2,120
1	Kitsap	WA	189,731	396	55	83	189,731	396
	Clallam	WA	56,464	1,745	356	83		
	Jefferson	WA	20,146	1,809	356	83		
	Island	WA	60,195	209	413	83		
1	King	WA	1,507,319	2,126	413	83	1,507,319	2,126
1	Pierce	WA	586,203	1,676	413	83	586,203	1,676
	San Juan	WA	10,035	175	413	83		
1	Skagit	WA	79,555	1,735	413	83	79,555	1,735
1	Snohomish	WA	465,642	2,090	413	83	465,642	2,090
	Chelan	WA	52,250	2,922	466	83		
	Douglas	WA	26,205	1,821	466	83		
	Grant	WA	54,758	2,676	466	83		
	Okanogan	WA	33,350	5,268	466	83		
	Kittitas	WA	26,725	2,297	482	83		
1	Yakima	WA	188,823	4,296	482	83	188,823	4,296
	TOTAL MTA 83		3,827,175	40,349			3,429,824	19,491
	METROPOLITAN PERCENT OF TOTAL MTA 83						89.619%	48.309%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/80 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 85								
BTA 41								
	Big Horn	MT	11,337	4,995	41	85		
	Carbon	MT	8,080	2,048	41	85		
	Carter	MT	1,503	3,340	41	85		
	Custer	MT	11,697	3,783	41	85		
	Daniels	MT	2,266	1,426	41	85		
	Dawson	MT	9,505	2,373	41	85		
	Fallon	MT	3,103	1,620	41	85		
	Garfield	MT	1,589	4,656	41	85		
	Golden Valley	MT	912	1,175	41	85		
	McCone	MT	2,276	2,643	41	85		
	Musselshell	MT	4,106	1,857	41	85		
	Petroleum	MT	519	1,654	41	85		
	Powder River	MT	2,090	3,287	41	85		
	Prairie	MT	1,383	1,737	41	85		
	Richland	MT	10,716	2,094	41	85		
	Roosevelt	MT	10,999	2,356	41	85		
	Rosebud	MT	10,505	5,012	41	85		
	Sheridan	MT	4,732	1,677	41	85		
	Stillwater	MT	6,536	1,795	41	85		
	Sweet Grass	MT	3,154	1,855	41	85		
	Treasure	MT	874	979	41	85		
	Valley	MT	8,239	4,921	41	85		
	Wheatland	MT	2,246	1,423	41	85		
	Wibaux	MT	1,191	899	41	85		
1	Yellowstone	MT	113,419	2,635	41	85	113,419	2,635
	Big Horn	WY	10,525	3,137	41	85		
	Park	WY	23,176	6,943	41	85		
1	Sheridan	WY	23,562	2,523	41	85	23,562	2,523
	TOTAL BTA 41		290,242	74,855			136,981	5,158
	METROPOLITAN PERCENT OF TOTAL BTA 41						47.199%	6.891%
BTA 460								
	Gilliam	OR	1,717	1,204	460	85		
	Morrow	OR	7,625	2,033	460	85		
1	Umatilla	OR	59,249	3,215	460	85	59,249	3,215
	Union	OR	23,596	2,087	460	85		
	Wallowa	OR	6,911	3,145	460	85		
	Columbia	WA	4,024	869	460	85		
1	Walla Walla	WA	48,439	1,271	460	85	48,439	1,271
	TOTAL BTA 460		151,563	13,774			107,688	4,486
	METROPOLITAN PERCENT OF TOTAL BTA 460						71.052%	32.569%

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/80 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 85 (CONT)								
1	Gallatin	MT	50,463	2,507	53	85	50,463	2,507
	Park	MT	14,562	2,656	53	85		
	Yellowstone N.P.	MT	52	246	53	85		
	Beaverhead	MT	8,424	5,543	64	85		
	Deer Lodge	MT	10,278	737	64	85		
	Madison	MT	5,989	3,587	64	85		
	Powell	MT	6,820	2,336	64	85		
1	Silver Bow	MT	33,941	718	64	85	33,941	718
	Blaine	MT	6,728	4,226	171	85		
1	Cascade	MT	77,691	2,698	171	85	77,691	2,698
	Chouteau	MT	5,452	3,973	171	85		
	Fergus	MT	12,083	4,359	171	85		
	Glacier	MT	12,121	2,995	171	85		
	Hill	MT	17,654	2,896	171	85		
	Judith Basin	MT	2,282	1,870	171	85		
	Liberty	MT	2,295	1,430	171	85		
	Meagher	MT	1,819	2,392	171	85		
	Phillips	MT	5,163	5,140	171	85		
	Pondera	MT	6,433	1,625	171	85		
	Teton	MT	6,271	2,273	171	85		
	Toole	MT	5,046	1,911	171	85		
	Broadwater	MT	3,318	1,191	181	85		
	Jefferson	MT	7,939	1,657	181	85		
1	Lewis and Clark	MT	47,495	3,461	181	85	47,495	3,461
1	Flathead	MT	59,218	5,099	224	85	59,218	5,099

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METROPOLITAN AND RURAL POPULATION AND AREA
SELECTED BTA'S AND MTA'S

Metro County	Counties	State	Population (4/1/90 Census)	Square Miles	BTA #	MTA #	Metro County Population	Metro County Area
MTA 85 (CONT)								
1	Benton	WA	112,560	1,703	228	85	112,560	1,703
1	Franklin	WA	37,473	1,242	228	85	37,473	1,242
	Clearwater	ID	8,505	2,462	250	85		
	Idaho	ID	13,783	8,485	250	85		
1	Latah	ID	30,617	1,077	250	85	30,617	1,077
	Lewis	ID	3,516	479	250	85		
1	Nez Perce	ID	33,754	849	250	85	33,754	849
	Asotin	WA	17,605	636	250	85		
	Garfield	WA	2,248	711	250	85		
	Granite	MT	2,548	1,726	300	85		
	Lake	MT	21,041	1,494	300	85		
	Mineral	MT	3,315	1,220	300	85		
1	Missoula	MT	78,687	2,596	300	85	78,687	2,596
	Ravalli	MT	25,010	2,394	300	85		
	Sanders	MT	8,669	2,782	300	85		
	Benewah	ID	7,937	776	425	85		
	Bonner	ID	26,622	1,738	425	85		
	Boundary	ID	8,332	1,269	425	85		
1	Kootenai	ID	69,795	1,245	425	85	69,795	1,245
	Shoshone	ID	13,931	2,684	425	85		
	Lincoln	MT	17,481	3,613	425	85		
	Adams	WA	13,603	1,925	425	85		
	Ferry	WA	6,295	2,204	425	85		
	Lincoln	WA	8,864	2,311	425	85		
	Pend Oreille	WA	8,915	1,400	425	85		
1	Spokane	WA	361,364	1,764	425	85	361,364	1,764
	Stevens	WA	30,948	2,478	425	85		
	Whitman	WA	38,775	2,159	425	85		
	TOTAL MTA 85		1,863,335	211,480			1,237,727	34,805
	METROPOLITAN PERCENT OF TOTAL MTA 85						66.425%	16.389%